

Composers Desktop Project Ltd. - A Social Enterprise

Privacy Policy (2018)

[General Data Protection Regulation coming into force on 25 May 2018]

What personal information we hold?

Since CDP initiated free downloads, CDP *no longer maintains a database of information about users*, only anonymous statistics about the downloads. Personal information is restricted to name, address and email addresses as on invoices and related documents for any products sold. Most of these are now 'historic' documents, which CDP is obliged to keep for 6 years. CDP does not and never has had any other forms of personal information about its users. CDP now only has email addresses for those who have contacted CDP directly, for those who have purchased *ProcessPack* (see below), and for those who have had a long-term special relationship with CDP.

Specifically, information is kept for:

- 1) those who have purchased *ProcessPack*: an email address list of users is retained to supply updates for bug fixes or to advise if a new version is available. Consent forms have been sent out and explicit permission must be given to remain on this list.
- 2) those (companies) with which CDP has entered into contracts; copies of the contracts are retained.

What we do with this information

CDP does not send out a Newsletter or email 'mailshots' to users of the CDP software. Information about CDP and changes to the software is communicated via the CDP Website. CDP only responds to those who have contacted CDP for information in order to deal with a problem or query regarding the CDP software.

However, *ProcessPack* users may be sent an email from CDP either to check on progress with resolving a problem or query, to deliver a free update or let them know that a new version is available. Consent forms have therefore been sent to these users to secure their permission for CDP to be on this email address list.

CDP does not contact previous donors to request further donations. This is left entirely to their own discretion. CDP does retain a financial record of the donations for its annual accounts reckoning.

Do we share your information?

CDP does not share any information with 3rd parties outside CDP Directors and users.

When a transaction involves payment to CDP, it is the company that handles the transaction which has the personal payment data (e.g., PayPal), not CDP. See their Privacy Policy statements.

Sometimes a user's email address may be passed on to another CDP person, usually for expert assistance on some problem, and occasionally to put users with similar interests or in the same locale in touch with one another. In the case of the latter, the person whose email address would be forwarded is first contacted for permission to do so.

How do we keep your information safe?

CDP stores its historic information on a computer or other storage medium (CD, flash drive) which is not connected to the Internet. The (few) email addresses on the CDP Administration computer are protected by the computer's password and firewall. The information is held and maintained by the Information Officer of CDP, currently the CEO.

How can you update and correct your personal information?

If you have changed your email address and would like CDP to be aware of this change, you can send an email to CDP Administration: [cdpse9\(at\)gmail.com](mailto:cdpse9@gmail.com)

You can also withdraw any consent given for CDP to retain your email address if you have contacted CDP in the past.

What is the lawful basis for processing your information?

Consent: Consent forms only concern *ProcessPack* updates because CDP does not do 'mailshots'.

Contractual relationships: When you purchase or donate to us, or otherwise enter into a contract with us, we'll need to make use of some basic information (see first paragraph).

Legal obligations: When strictly necessary, we'll process your personal information due to a binding legal obligation on us.

Legitimate interests: Use of information to respond to user queries or to put users in contact with one another, the latter only with the explicit permission of the person whose information is being forwarded.

[Last updated: 21 May 2018]